

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:24-cv-60312-AHS

DVASH AVIATION HOLDINGS, LLC,

Plaintiff,

v.

AMP LEASING LIMITED,

Defendant.

/

**UNOPPOSED MOTION FOR EXTENSION OF  
DEADLINE TO COMPLETE DISCOVERY**

The Defendant AMP Leasing Limited (“AMP Leasing”), by and through its undersigned counsel, submits this unopposed motion pursuant to Fed. R. Civ. P. 6(b)(1) (the “Unopposed Motion”) for a fourteen (14) day extension of the deadline to complete discovery as required by the Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge [DE 27] (the “Scheduling Order”). For the reasons set forth below, AMP Leasing requests that the Court grant the Unopposed Motion.

1. On July 31, 2024, the Court issued the Scheduling Order which established various deadlines in the case.
2. The Scheduling Order establishes January 17, 2025 as the deadline to complete discovery.
3. Counsel for the Parties are still attempting to schedule the deposition of David Butler, the President of Dvash Aviation Holdings, LLC (“Dvash”), and due to the schedules of the parties and counsel need some additional time beyond the deadline set forth in the Scheduling Order.

4. It is for this reason that AMP Leasing is filing this Unopposed Motion seeking a twenty-one (21) day extension of this deadline.

5. This request is being made prior to the expiration of the initial deadline and AMP Leasing submits that good cause exists for the granting of this extension of time.

6. Undersigned counsel contacted counsel for Dvash regarding the relief requested in this Unopposed Motion and represents to the Court that counsel for Dvash has no objection to the extension of time requested in this Unopposed Motion.

WHEREFORE, the Defendant AMP Leasing respectfully requests that this Court grant the Unopposed Motion and extend the time for the parties to complete discovery through Friday, February 7, 2025, together with granting such other and further relief as to this Court appears just and proper.

Respectfully submitted,

/s/ Seth P. Robert

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*Attorneys for Defendant AMP Leasing Limited*

**Certificate of Service**

I hereby certify that on January 17, 2025 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

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